

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LAURITA SULLIVAN and CARLOS BRYANT,)
on behalf of themselves and all others)
similarly situated;)
Plaintiffs,)
v.) C.A. No. 1:17-cv-12009
SLEEPY'S LLC;)
MATTRESS FIRM, INC.;)
Defendants.)

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT
AGREEMENT, DIRECTING NOTICE TO THE CLASS, AND SCHEDULING
FAIRNESS HEARING**

The action was brought by the Plaintiffs Laurita Sullivan and Carlos Bryant (the “Plaintiffs” or “Named Plaintiffs”) against Sleepy’s LLC and Mattress Firm, Inc. (collectively “Defendants”) on behalf of commissioned salespeople, (collectively, “Class” or “Class Members”) who worked for Sleepy’s LLC in Massachusetts. Defendants have denied all wrongdoing and liability to Plaintiffs and the Class Members, and have defended the lawsuit vigorously.

The parties have reached an agreement to settle this action on a class-wide basis (Settlement Agreement attached as Exhibit A). The proposed settlement is a fair result for the class and will allow the class to avoid the delay and uncertainty of further litigation.

The Plaintiffs and Defendants, for the reasons set forth in their memorandum, respectfully request that this Court grant preliminary approval of the settlement and the proposed Plan of Distribution as fair, reasonable, and adequate, authorize the Administrator to mail the

proposed Notice of settlement and claim form to the class and schedule a Fairness Hearing for a date no earlier than December 14, 2019.

Respectfully submitted,

Plaintiffs

By their attorneys,

/s/

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DEFENDANTS SLEEPY'S LLC and MATTRESS FIRM, INC.,
By their attorneys,

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Dated: July 31, 2019

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2019, I served an original and copy of the foregoing document upon counsel for Defendants via the Court's ECF system.

/s/

John P. Regan

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